

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA**

In re: Andrew John Marshall

Case No. 22-41753
Chapter 13

Debtor.

**NOTICE OF HEARING AND MOTION
TO WITHDRAW AS DEBTORS ATTORNEY**

TO: THE COURT, UNITED STATES TRUSTEE, TRUSTEE, AND ALL DEBTORS
CREDITORS:

1. Wesley W. Scott, attorney for the above-named debtor moves the Court for the relief requested below and gives notice of hearing.

2. The Court will hold a hearing on this motion on Thursday, October 5, 2023 at 9:30 a.m. at the United States Bankruptcy Court, Courtroom 8 West, 8th Floor, 300 South 4th Street, Minneapolis, MN.

3. Any response to this motion must be filed and delivered not later than Thursday, September 28, 2023, which is seven days before the time set for the hearing (including Saturdays, Sundays and legal holidays). **UNLESS A RESPONSE OPPOSING THE MOTION IS TIMELY FILED, THE COURT MAY GRANT THE MOTION WITHOUT A HEARING.**

4. This Court has jurisdiction over this motion pursuant to 28 U.S.C. §§ 157 and 1334, Bankruptcy Rule 5005 and Local Rule 9010-3(e). This motion is filed under Local Rule 9010-3(e); for professional and ethical reasons, Movant requests an Order allowing debtor's attorney to withdraw from representation of debtor in the above bankruptcy case. This proceeding is a

core proceeding. The petition commencing this Chapter 13 case was filed on October 19, 2022.
The case is now pending in this Court.

Date: September 12, 2023

LIFEBACK LAW FIRM, P.A.

/e/ Wesley W. Scott
Wesley W. Scott #0264787
13 7th Ave South
Saint Cloud, MN 56303
(320) 252-0330
wes@lifebacklaw.com

VERIFICATION

I, Wesley W. Scott, the movant named in the foregoing Notice of Hearing and Motion for permission to withdraw as attorney for debtors, declare under penalty of perjury that the foregoing is true and correct according to the best of my knowledge, information and belief.

Dated: September 12, 2023

/e/ Wesley W. Scott
Attorney for Debtor

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MEMORANDUM OF LAW

Local Rule of the United States Bankruptcy Court for the District of Minnesota 9010-3(e)(2) is written in pertinent part to provide that:

...An attorney in a bankruptcy case whose employment was subject to approval by the court, an attorney for any party in an adversary proceedings, or an attorney for a debtor in a Chapter 7 or 13 case who wishes to withdraw without a substitution of attorney shall make a motion for leave to withdraw".

Debtor, : Andrew John Marshall, hired movant as their attorney on or about October 13, 2022. Subsequent to hiring movant as their bankruptcy attorney, movant's office prepared a bankruptcy petition, which was signed by Andrew John Marshall and was filed on October 19, 2022.

For professional and ethical reasons, pursuant to Local Rule of the United States Bankruptcy Court for the District of Minnesota 9010-3(e)(2) movant respectfully requests an Order granting permission to withdraw as attorney for Debtor.

Dated: September 12, 2023

LIFEBACK LAW FIRM, P.A.

/e/ Wesley W. Scott
Wesley W. Scott #0264787
13 7th Ave South
Saint Cloud, MN 56303
(320) 252-0330
wes@lifebacklaw.com

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UNSWORN CERTIFICATE OF SERVICE

I, Samantha M. Googins, declare under penalty of perjury that on September 12, 2023, 2023 she caused to be served the Notice of Hearing and Motion for Leave to Withdraw as Debtors Attorney and Memorandum via the CM/ECF system to those parties requesting electronic notification and upon all parties in interest at the addresses set forth in the exhibit which is attached hereto and on the debtors, by first class mail:

Dated: September 12, 2023

/e/ Samantha M. Googins
Samantha Googins
LifeBack Law Firm, P.A.

Label Matrix for local noticing
0864-4
Case 22-41753
District of Minnesota
Minneapolis
Tue Sep 12 13:36:28 CDT 2023

Aidvantage on behalf of
Dept of Ed Loan Services
P.O. Box 300001
Greenville, TX 75403-3001

American Express National Bank
c/o Becket and Lee LLP
PO Box 3001
Malvern PA 19355-0701

Bank of America, N.A.
PO Box 673033
Dallas, TX 75267-3033

Centerpoint Energy
PO Box 1144
Minneapolis MN 55440-1144

Delata Dental of MN
500 Washington Ave S.
Suite 2060
Minneapolis MN 55415-1163

IHealth
PO BOX 860596
Minneapolis MN 55486-0525

(p)JEFFERSON CAPITAL SYSTEMS LLC
PO BOX 7999
SAINT CLOUD MN 56302-7999

MNGI
PO BOX 14829
Minneapolis MN 55414-0829

Navient Solutions Inc
Attn: Bankruptcy
P.O. Box 9500
Wilkes-Barre PA 18773-9500

Minneapolis
301 Diana E. Murphy U.S. Courthouse
300 South Fourth Street
Minneapolis, MN 55415-1320

Allina Health
2925 Chicago Ave
Minneapolis MN 55407-1321

Amex
Correspondence/Bankruptcy
Po Box 981540
El Paso TX 79998-1540

CareCredit
PO BOX 960061
Orlando FL 32896-0061

Centracare
1406 6th Ave N
Saint Cloud MN 56303-1901

(p)FIRST NATIONAL BANK OF OMAHA
1620 DODGE ST
STOP CODE 3113
OMAHA NE 68102-1593

Infinite health Collaborative
PO Box 860596
Minneapolis MN 55486-0525

LVNV Funding, LLC
Resurgent Capital Services
PO Box 10587
Greenville, SC 29603-0587

Midwest Radiology
PO Box 1259
Dept. #165957
Oaks PA 19456-1259

Pathlight Property Managment
6500 International Pkwy
Suite 100
Plano TX 75093-8222

Advantage Collection
495 2nd Ave SE
Cambridge MN 55008-1708

Allina Health
PO BOX 77008
Minneapolis MN 55480-7708

Bank of America
Attn: Bankruptcy
4909 Savarese Circle
Tampa FL 33634-2413

CareCredit Synchrony Bank
PO Box 960061
Orlando FL 32896-0061

Deanne Marie Marshall
687 Brianna Drive Unit 2
Sartell MN 56377-2192

HCMC
PO Box 1238
Minneapolis MN 55440-1238

Internal Revenue Service
Centralized Insolvency
PO Box 7346
Philadelphia PA 19101-7346

MN Dept of Revenue
Attn: Denise Jones
PO Box 64447
Saint Paul MN 55164-0447

Midwest Radiology
PO Box 1259
Dept. #16597
Oaks PA 19456-1259

(p)RELIANCE RECOVERIES
ATTN ACCOUNTS RECEIVABLE SERVICES
6160 SUMMIT DR N
SUITE 440
BROOKLYN CENTER MN 55430-2149

Saint Cloud Credit Union
Attn: Bankruptcy
3030 1st Street South
Saint Cloud MN 56301-3867

St Cloud Financial Credit Union
3030 1st St S
St Cloud, MN 56301-3867

State Farm Payment Plan
PO BOX 52265
Phoenix AZ 85072-2265

Synco/Mills Fleet Farm
Attn: Bankruptcy
Po Box 965060
Orlando FL 32896-5060

Synchrony Bank/Care Credit
Attn: Bankruptcy Dept
Po Box 965064
Orlando FL 32896-5064

US Trustee
1015 US Courthouse
300 S 4th St
Minneapolis, MN 55415-3070

Verizon Wireless BK Admin
500 Technology Drive
Suite 550
Weldon Springs MO 63304-2225

Andrew John Marshall
5581 154th Lane NW
Ramsey, MN 55303-7047

Gregory A Burrell
100 South Fifth Street
Suite 480
Minneapolis, MN 55402-1250

Wesley W. Scott
LifeBack Law Firm, PA
13 Seventh Ave S
St Cloud, MN 56301-4259

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

FNBO
PO BOX 3331
Omaha NE 68103

(d)First National Bank
Attn: Bankruptcy
P.O. Box 3128
Omaha NE 68103

(d)First National Bank of Omaha
1620 Dodge Street, Stop Code 3113
Omaha, Nebraska 68197

Jefferson Capital Systems LLC
Po Box 7999
Saint Cloud MN 56302-9617

Reliance Recoveries
PO Box 29227
Minneapolis MN 55429

End of Label Matrix
Mailable recipients 39
Bypassed recipients 0
Total 39

UNITED STATES BANKRUPTCY COURT
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ORDER

This matter came on for hearing before the undersigned bankruptcy Judge on the 27th day of September, 2023.

Upon the Motion of debtor's attorney, and the documents of record herein, and the Court being fully advised in the premises.

IT IS ORDERED:

That debtors attorney, Wesley W. Scott, is hereby granted permission to withdraw as attorney for the above-named debtor, Andrew John Marshall .

Dated: _____

Katherine A. Constantine
United States Bankruptcy Judge